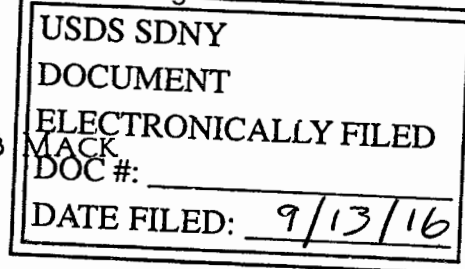


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MEMO ENDORSED

September 8, 2016

VIA ECF and E-mail

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Williams, Steven Brown, Gerald Seppala.*
Docket No. S3 16 Cr. 436 (KMW)

Responsive Letter to The Court's September 6, 2016
Order Regarding European Travel

Dear Judge Wood:

I write at the Court's direction to provide further justification for Mr. Brown's travel to Europe beyond that contained in my letter of August 31, 2016. Mr. Brown's requested international travel is necessary primarily for business reasons but also for a family baptism and his wife's birthday.

What is at stake in our application is Mr. Brown's ability to maintain his current employment. The movie business is significantly international in scope at this time with business interaction from pre-production through distribution world-wide in scope and effect. Steven J. Brown's special place in this business arises from personal contacts and the respect he has earned as an innovative and effective, on location, executive in determining and overcoming issues of casting, advertising, pre-production, site selection, filming, distribution, sales and promotion. He

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does not function as a lawyer, accountant nor director and seldom as an investor other than by agreement justified by the provision of his services. He is a troubleshooter with widely recognized expertise, has made notable movies and suffuses energy to overcome problems. It is his presence, contacts, personal skills and professional expertise and experience delivered on location that is Mr. Brown's business and employment.

The government seems to rely on IMDB which is an Amazon-owned public movie press news website (not an official studio production) that may strive to be accurate but often is not. Especially concerning to the defense is utilization of attorney correspondence with the Court and the filed indictment herein to attempt to extort civil payments from the defendants or their associates or to injure their personal reputations well beyond what the indictment and press release has already done to their business interests, without any allowance for the presumption of innocence that they are entitled to. There may come a time I will ask the Court to permit me to issue process for a hearing to determine the circumstance of the genesis of this conduct as it may itself be a violation of applicable Disciplinary Rules or Federal or State Criminal Law.

However, given the family occasions at stake and the importance of Mr. Brown's business needs, my priority is to seek to persuade Your Honor that he be permitted to travel promptly to maintain his business.

I again will expand upon my numbered representations in the Order set forth in my letter of August 31, 2016:

1) Confirm 8/31/16 statements; Furthermore Mr. Brown would be discussing with potential buyers in Paris and the United Kingdom with whom he has personal and professional relationships their possible purchase of these two movies beyond the ten percent of already completed sales.

2) Confirm 8/31/16 statements; In addition, again his personal contacts are instrumental in potential sales, his counsel in re-shoots and post-production issues. And now to overcome the extreme uneasiness of cast and crew in Spain generated by a former disgruntled employee who messaged the following on September 1st, last week, to members of the film crew:

(Names and Link Redacted)

,

"For your information Steven Brown (Astrid Montgomery's husband and Franzese's partner, as well as self appointed Executive Producer of Dance Angels) was recently arrested on serious film fraud charges by the FBI in New York. He is currently on bail and

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is attempting to leave the USA on the grounds of finishing Dance Angels (including re-casting, re-filming with new music etc.) in September.

I cannot tell you too much, other than the FBI investigation into Brown (who has been implicated in a string of major film frauds) is ongoing and further FBI arrests are expected, with those closely associated with Brown.

I have asked you a few weeks ago if you have heard from Franzese in regards to your payment or about the filming they planning in September in Spain?

Needless to say the FBI and the prosecutors are objecting to Brown being allowed to leave the USA on these grounds.

Please see link!"

[REDACTED]

Since my August 31, 2016 'Dance Angels' language had only been filed with the Court on one day prior, it seems more than a fair question how did the sender receive notice of Mr. Brown's position and then use it immediately to harm Mr. Brown's personal and business interests. This is not the first time in the context of the controversy surrounding the long prefatory civil proceeding in this matter that similar damaging rumors and innuendoes have been used by others to financially damage the defendants herein.

3) Confirm 8/31/16 statements; Mr. Brown's professional relationships with journalist and potential buyers in Europe are important to the commercial success of this film for the important holiday release.

4) Confirm 8/31/16 statements; His specific and assigned role in this planned film relies on his personal relationship with executives important to the film's success, in addition, on Mr. Brown's experience in location scouting as well as in international sales and marketing.

5) Confirm 8/31/16 statements; It is Mr. Brown's personal and professional relationship with persons associated with the actor which requires his presence in England.

Each of these purposes are essential predicates to success at the International Film Festivals in Toronto, Southern France and Berlin which are so key to success in the movie industry, which occur later in the Fall.

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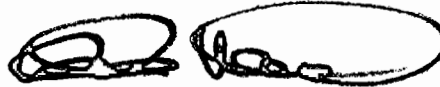
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Mr. Brown and others can appear to testify or to attest to the facts asserted herein. Mr. Brown has demonstrated to the Court his reliability and integrity in his previous trip to France. He strives hard and diligently to honor his obligations to the Pretrial Services Officers, and I have not heard to the contrary despite my standing invitation to them to inform me whenever and however they are unhappy with him.

I have responded to the Court's direction as of Tuesday so quickly because of the direction by my client to make every effort to obtain permission to permit him to attend the family Baptism on Saturday, September 10th and his wife's birthday next Monday.

Thank you for your consideration of this request.

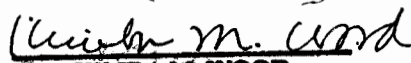
Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
PTSO Matthew Carter (by email)
PTSO Natasha Ramesar (by email)

*Mr. Brown may travel to Europe,
as set forth in Mr. Mack's August 25,
2016, letter to me, beginning now,
for up to ten days.*

9-13-16
SO ORDERED, N.Y., N.Y.

KIMBA M. WOOD
U.S.D.J.